

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHRISTIAN ALBERTO SANTOS GARCIA,
et al.,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, in his official capacity as Secretary, U.S. Department of Homeland Security, *et al.*,

Defendants.

Case No. 1:20-cv-00821 (LBM/JFA)

**JOINT STIPULATION OF PLAINTIFFS AND DEFENDANTS IMMIGRATION
CENTERS OF AMERICA – FARMVILLE, LLC AND JEFFREY CRAWFORD**

COMES NOW Plaintiffs, Christian Alberto Santos Garcia, Santos Salvador Bolanos Hernandez, Gerson Amilcar Perez Garcia, Ismael Castillo Gutierrez, Didier Mbalivoto, Frank Odin Souza Bauer, Marco Antonio Miranda Sanchez, Melvin Ivan Velasquez Orellana, Olaitan Michael Olaniyi, Shawn Houslin, Jerbin Ivan Garcia Garcia, Jorge Alexander Rivera Rodriguez, Jose Linares Hernandez, and Vano Bazerashvili (the “Plaintiffs”), and Defendants Immigration Centers of America – Farmville, LLC and Jeffrey Crawford (the “Farmville Defendants”) (together, with Plaintiffs, “the Parties”), by and through undersigned counsel, hereby stipulate as follows:

1. By Joint Motion to Stay Briefing and Continue the Hearing on Motions for Summary Judgment Relating to Counts II and III (“Motion to Stay,” ECF No. 189), filed on July 23, 2021, the Parties notified the Court that they had resolved in principle all matters in this

litigation as between and among them and required a brief period of not more than 30 days to effectuate a settlement agreement.

2. By Order entered July 23, 2021 (ECF No. 190), the Court granted the Motion to Stay.

3. The Parties reached agreement on the form of a written settlement agreement on August 3, 2021 and informed the Court via a Notice filed on August 23, 2021 (ECF No. 191).

4. The Parties exchanged a fully executed settlement agreement on September 2, 2021.

5. Farmville Defendants fulfilled their obligations under Paragraph 1 of the Settlement Agreement on September 7, 2021.

6. Therefore, Plaintiffs agree to dismiss their claims against the Farmville Defendants with prejudice.

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs respectfully request that this Court enter an Order dismissing their claims against the Farmville Defendants, with prejudice.

Dated: September 9, 2021

Respectfully submitted,

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By: *s/Simon Sandoval-Moshenberg*

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

Dated: September 9, 2021

Respectfully submitted,

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